



Three World Financial Center
New York, New York 10281-2101
Telephone: 212-415-8600
Fax: 212-303-2754
www.lockelord.com

Gregory T. Casamento
Direct Telephone: 212-415-7525
Direct Fax: 212-303-27540
gcasamento@lockelord.com

May 6, 2015

VIA ECF

The Honorable George B. Daniels
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

VIA FACSIMILE (212-805-6111)

The Honorable Henry B. Pitman
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Laydon v. Mizuho Bank, Ltd. et al.*, No. 1:12-cv-03419-GBD
Response to Plaintiff's January 23, 2015 Letter

Dear Judges Daniels and Pitman:

We represent the HSBC Defendants in the above-referenced action. We write on behalf of all defendants in response to plaintiff's letter dated May 1, 2015 (Dkt 464) requesting a conference on discovery related issues.

Defendants' position regarding plaintiff's request for a discovery conference is set forth in our prior letter to the Court dated March 31, 2015 (Dkt 445). In short, defendants have asserted a number of objections to plaintiff's first request for production of documents, as have several regulatory agencies in Europe and Asia. Based on the Court's statements at our conference on April 7, 2015, we understood that the next step for addressing these objections would be for Magistrate Judge Pitman to set a schedule for briefing and arguing the objections. We believe that is the proper way to proceed.

We disagree with plaintiff's contention that the Court has ordered the defendants to start producing documents on May 15, 2015. Our position regarding that contention is set forth in my email to plaintiffs' counsel dated May 1, 2015, which is attached as Exhibit A to plaintiff's letter to the Court of the same date (Dkt 464).

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Gregory T. Casamento".

Gregory T. Casamento
Counsel for HSBC Defendants

cc: All Counsel of Record (by email)